

September 10, 2015

BY ECF

Hon. Sterling Johnson, Jr.
Senior United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Woods v. The City of New York, et al., No. 15-cv-05167 (SJ) MDG)

Dear Judge Johnson:

We were recently retained by defendant the Port Authority of New York and New Jersey (the "Port Authority"). On September 4, 2015, the Port Authority removed the action to this Court from the Supreme Court of the State of New York, County of Queens. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), the Port Authority's response to Plaintiff's complaint is due on September 11, 2015. We write to respectfully request an extension of time to and including October 9, 2015, to respond to the complaint. We have contacted counsel for Plaintiff on multiple occasions to seek their consent to this request but have not yet received a response.

In addition, co-defendant The City of New York (the "City") has asserted a cross-claim against the Port Authority. Although the cross-claim has not been formally served on the Port Authority, we respectfully request an extension of time to and including October 9, 2015, to respond to the City's cross-claim. We have contacted the City regarding this request but have not yet received a response.

The Port Authority has not made any prior requests for extensions of time.

Respectfully submitted,



Diane Westwood Wilson

cc: Mark J. Linder (counsel for Plaintiff) (via ECF)
Jeff Casey (counsel for The City of New York) (via U.S. Mail)